

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:20-CR-75
	:	
vs.	:	
	:	Judge Michael J. Newman
MICHAEL RHEA,	:	
	:	
Defendant.	:	

**SECOND MOTION TO REVOKE DETENTION ORDER PURSUANT TO 18 U.S.C.
§3145(b)/MOTION FOR BOND**

Defendant, Michael Rhea (“Mr. Rhea”), by and through counsel, and pursuant to 18 U.S.C. §3145(b), respectfully requests that this Court revoke the detention order entered herein, and release him on bond. As grounds for this Motion, Mr. Rhea states that there are conditions on which he could be released, that would secure his appearance at trial, and which would not jeopardize the community’s safety, or the safety of any other person.

Mr. Rhea additionally incorporates his Motion to Reopen the Detention Hearing, previously filed herein at Docket #11 for consideration, wherein Mr. Rhea presented options which he believed would assure his appearance at trial, and the community’s safety, which included GPS monitoring and third party custodians in the persons of Mr. Rhea’s parents. In addition, as Mr. Rhea noted, at the time of his arrest, he was scheduled to begin substance abuse counseling; a condition which would have surely helped to alleviate flight and safety concerns.

Mr. Rhea states that since the filing of his first motion, there has been a change in circumstances warranting reconsideration of the Court’s Detention Order, including resolution of certain pending matters. Mr. Rhea has discussed the filing of this Motion with the government

and in light of these developments, he respectfully requests that the Court revoke the previously entered Detention Order and release him on bond.

Respectfully submitted:

DEBORAH L. WILLIAMS
Federal Public Defender

by s/Cheryll A. Bennett
Cheryll A. Bennett (0063671)
Office of the Federal Public Defender
1 South Main Street, Suite 490
Dayton, Ohio 45402
(937) 225-7687
Cheryll_Bennett@fd.org

Attorney for Defendant
Michael Rhea

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Dwight Keller, Assistant United States Attorney, on the date same was filed.

s/Cheryll A. Bennett
Cheryll A. Bennett